DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare as follows:

1. On July 31 and August 1, 1986 my deposition was taken by attorney Eric Blumenson in the case of Michael Flynn v. Church of Scientology, et al., No. CV 85-4853-R(Mcx). During his questioning of me, Mr. Blumenson revealed that the individual who had filed the complaint against me with the FBI in Boston in October 1985 was a woman named Mitra Hall. Prior to that time I had never heard of Ms. Hall.

2. This morning I had business which brought me at approximately 10:00 a.m. to the MBTA Green Line Auditorium stop on Massachusetts Avenue in Boston. As I was about to enter the station to take the train to work, I was approached by a woman who asked me if I would like to take a "free personality test." The woman was approximately 30 years old, about five feet four inches in height, dark haired, light brown skinned, and big-chested. She carried in her hand a bunch of cards with the words "personality test" printed on them. Recalling that the complaint filed against me with the FBI had alleged that I had identified myself as an FBI agent to an individual handing out personality test cards at this same location, I asked the woman her name. She said, "Mitra Hall."

3. I then asked Ms. Hall if she knew who I was. She said, "No." I asked her if she had ever seen me before. She said, "No." I asked her a number of times and in different ways if she was absolutely sure she had never seen me before. She said, "No" to each question. It was clear that Ms. Hall had never

seen me before. And I had never seen her before, and had never been to the Auditorium stop nor that part of Boston at any time before today.

4. I identified myself to Ms. Hall then questioned her about the incident which had allegedly occurred last October. She told me that she had been shown several photographs of me by someone, whom she would not name, in the legal department of the Boston Scientology organization, and had identified me as a result of being shown the photos. She stated that she had been accompanied by Scientology attorney Roger Geller when she went to the FBI to file the complaint.

5. I told Ms. Hall that she had filed a false complaint against me, and she stated she was justified "because (I was) trying to destroy (her) church." She reiterated this charge, and the charge that my attorney Michael Flynn was trying to destroy her church, several times. It was clear from Ms. Hall's failure to recognize me and from what she said that her complaint against me was false, but that she considered her action in filing the false complaint laudable because I was Scientology's "enemy." Following our conversation, which lasted about three minutes, I entered the train station and traveled to my workplace.

I declare under the penalty of perjury under the Laws of the State of California that the foregoing is true and correct.

Executed this 12th day of August, 1986 at Boston, Massachusetts.

Gerald Armstrong